

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

Hollinger v. Commissioner of Social Security

No. 1:25-CV-01133-CEH (N.D. Ohio Jan. 12, 2026) · No. 1:25-CV-01133-CEH · Decided January 12, 2026

SUMMARY

The United States District Court for the Northern District of Ohio reviews the Commissioner of Social Security’s denial of Dana Elizabeth Hollinger’s application for Supplemental Security Income. The court rejects challenges concerning consideration of migraines, obesity, residual functional capacity, and symptom evaluation under applicable Social Security Rulings. The court affirms the Commissioner’s nondisability determination and dismisses the complaint.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio
WRITING FOR THE COURT	Carmen E. Henderson
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	January 12, 2026
DOCKET	1:25-CV-01133-CEH
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of final decision of Commissioner of Social Security denying application for Supplemental Security Income.
STANDARD OF REVIEW	Substantial evidence and proper legal standards
PRECEDENTIAL VALUE	unpublished
PARTIES	Dana Elizabeth Hollinger v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- disability definition
- ada / disability
- administrative law

PRACTICE AREAS

- administrative law
- social security

QUESTIONS PRESENTED

1. Whether the ALJ properly considered all of claimant's impairments, specifically migraine headaches, under SSR 96-8p in forming the residual functional capacity
2. Whether the ALJ erred at step three by failing to find that claimant's obesity equaled a listing under SSR 19-2p
3. Whether the ALJ properly applied SSR 16-3p in evaluating claimant's symptom testimony

HOLDINGS

1. The ALJ did not err in considering plaintiff's migraines; the ALJ reasonably found migraines were not a severe impairment due to lack of ongoing significant symptoms or limitations, and any error at step two was harmless because the ALJ proceeded through the sequential evaluation considering all impairments.
2. The ALJ did not err in failing to consider whether migraines equaled Listing 11.02B because migraines were not a severe impairment; even if error occurred, it was harmless because claimant failed to show her migraines equaled the listing.
3. The ALJ properly considered claimant's obesity in formulating the RFC and found the combination of impairments did not equal a listing.
4. The ALJ properly considered plaintiff's symptom allegations in accordance with SSR 16-3p; the ALJ's credibility determination was supported by substantial evidence.

KEY QUOTATIONS

“the Court AFFIRMS the Commissioner of the Social Security Administration's final decision denying Plaintiff benefits. Plaintiff's Complaint is DISMISSED.”

FACTUAL BACKGROUND

Claimant applied for SSI alleging disability from low back/pelvic pain, anxiety, and depression. Medical records showed obesity, lumbar and sacral somatic dysfunction, bipolar disorder, generalized anxiety disorder, and PTSD. Claimant testified to limited sitting, standing, and walking ability. ALJ found claimant had RFC for light work with limitations.

PROCEDURAL HISTORY

Claimant applied for SSI, denied initially and on reconsideration. ALJ held hearing and found claimant not disabled. Appeals Council declined review. Claimant filed complaint for judicial review.

DISPOSITION

affirmed

CASES CITED

- Winn v. Comm'r of Soc. Sec., 615 F. App'x 315 (6th Cir. 2015)
- Rogers v. Comm'r of Soc. Sec., 486 F.3d 234 (6th Cir. 2007)

- *Cutlip v. Sec'y of HHS*, 25 F.3d 284 (6th Cir. 1994)
- *Olive v. Comm'r of Soc. Sec.*, No. 3:06 CV 1597, 2007 WL 5403416 (N.D. Ohio Sept. 19, 2007)
- *Abbott v. Sullivan*, 905 F.2d 918 (6th Cir. 1990)
- *Mullen v. Bowen*, 800 F.2d 535 (6th Cir. 1986)
- *Kinsella v. Schweiker*, 708 F.2d 1058 (6th Cir. 1983)
- *Combs v. Comm'r of Soc. Sec.*, 459 F.3d 640 (6th Cir. 2006)
- *Walters v. Comm'r of Soc. Sec.*, 127 F.3d 525 (6th Cir. 1997)
- *Kestel v. Comm'r of Soc. Sec.*, 756 F. App'x 593 (6th Cir. 2018)
- *Nash v. Comm'r of Soc. Sec.*, No. 19-6321, 2020 WL 6882255 (6th Cir. Aug. 10, 2020)
- *Forrest v. Comm'r of Soc. Sec.*, 591 F. App'x 359 (6th Cir. 2014)
- *Emard v. Comm'r of Soc. Sec.*, 953 F.3d 844 (6th Cir. 2020)
- *Snyder v. Comm'r of Soc. Sec.*, No. 22-5948, 2023 WL 3673265 (6th Cir. May 26, 2023)
- *Jurcago v. Comm'r of Soc. Sec.*, No. 5:23-CV-01187-JG, 2024 WL 2786694 (N.D. Ohio May 2, 2024)
- *Siterlet v. Sec'y of HHS*, 823 F.2d 918 (6th Cir. 1987)
- *Fleischer v. Astrue*, 774 F. Supp. 2d 875 (N.D. Ohio 2011)
- *Cross v. Comm'r of Soc. Sec.*, 373 F. Supp. 2d 724 (N.D. Ohio 2005)
- *Felisky v. Bowen*, 35 F.3d 1027 (6th Cir. 1994)
- *Carr v. Comm'r of Soc. Sec.*, No. 3:18-cv-1639, 2019 WL 2465273 (N.D. Ohio April 24, 2019)
- *Wright v. Massanari*, 321 F.3d 611 (6th Cir. 2003)
- *Key v. Callahan*, 109 F.3d 270 (6th Cir. 1997)
- *Robinson v. Comm'r of Soc. Sec.*, No. 13-CV-11637, 2014 WL 3528434 (E.D. Mich. July 16, 2014)